

1 DAVID L. ANDERSON (CABN 149604)  
2 United States Attorney

3 SARA WINSLOW (DCBN 457643)  
4 Chief, Civil Division

5 JULIE C. REAGIN (CABN 167934)  
6 Assistant United States Attorney  
7 450 Golden Gate Avenue, Box 36055  
8 San Francisco, California 94102-3495  
Telephone: (415) 436-7181  
Fax: (415) 436-6570  
Email: Julie.Reagin@usdoj.gov

9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13  
14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 AMIR BAKHTIARI A/K/A AMIR  
18 GALEHBAKHTIARI,

19 Defendant.

20 FARMERS & MERCHANTS BANK,

21 Garnishee.

CASE NOS. CR 18-009-01 WHA  
CR 19-127-01 WHA

**WRIT OF CONTINUING GARNISHMENT**

24 TO: Farmers and Merchants Bank of Long Beach  
25 Attn: Operations Legal Department  
26 302 Pine Avenue  
27 Long Beach CA 90802

1           **YOU ARE HEREBY COMMANDED TO GARNISH FOR THE BENEFIT OF THE**  
2           **UNITED STATES OF AMERICA PROPERTY IN YOUR POSSESSION IN WHICH THE**  
3           **DEFENDANT-JUDGMENT DEBTOR HAS A SUBSTANTIAL NONEXEMPT INTEREST.**

4           The name, last known address, and last four digits of the social security number of the person  
5           who is the defendant-judgment debtor (“defendant”) in this action and whose property is subject to this  
6           Writ are as follows:

7           Amir Bakhtiari a/k/a Amir Galehbakhtiari  
8           Northlake Correctional Facility  
9           1805 West 32<sup>nd</sup> St., Baldwin, MI 49304  
Social Security Number (last four digits): XXX-XX-6742

10          This Writ has been issued pursuant to a stipulation between the United States of America and  
11          Amir Bakhtiari a/k/a Amir Galehbakhtiari, to enforce the collection of a criminal judgment entered in  
12          favor of the United States against the defendant for a debt in the original amount of \$8,062,750.00. As  
13          of June 30, 2020, the total balance due on the judgment debt, including accrued interest, was  
14          \$7,558,295.26.

16          The following are the steps that you must take to comply with this Writ. If you have any  
17          questions, you should consult with your attorney.

18          1.       Pursuant to 28 U.S.C. § 3205(c)(2)(F), if you have in your custody, control, or possession  
19          any property of the defendant in which the defendant has a substantial nonexempt interest, or if you  
20          obtain custody, control, or possession of such property while this Writ is in effect, you must  
21          immediately withhold such property from the defendant and retain it in your possession until you  
22          receive instructions from the Court which will tell you what to do with the property. Such property  
23          would include, but not be limited to, accounts in the names of Amir Bakhtiari and Joscelyne Alkus  
24          ending in XXXX1969 and XXXX4135.

25          2.       Pursuant to 28 U.S.C. § 3205(c)(2)(E), you are required to answer this Writ within 10  
26          days after service of this Writ upon you. You must answer the Writ even if you do not have in your  
27          custody, control, or possession, any property of the defendant. Pursuant to 28 U.S.C. § 3205(c)(4), your  
28

answer must state, under oath, the following information:

- a. Whether or not you have in your custody, control, or possession, any property owned by the defendant in which the defendant has a substantial nonexempt interest, including nonexempt disposable earnings;
- b. a description of such property and the value of such property;
- c. a description of any previous garnishments to which such property is subject and the extent to which any remaining property is not exempt; and
- d. the amount of the debt you anticipate owing to the defendant in the future and whether the period for payment will be weekly or another specified period.

For your convenience, a form which addresses the above-requested information is attached and may be used to answer the Writ.

3. After you complete the answer under oath, pursuant to 28 U.S.C. § 3205(c)(2)(E) and (c)(4), within ten (10) days after service of this Writ upon you, you must mail or deliver the original answer bearing the original signature of the person preparing the answer to the Court at the following address:

Office of the Clerk  
United States District Court  
450 Golden Gate Ave., Box 36060  
San Francisco, CA 94102

At the same time you mail or deliver the original answer to the Court, you must also mail or  
deliver a copy of the original answer to both counsel for the defendant and attorney for the United States  
at the following respective addresses:

Martha Boersch, Esq.  
Boersch & Illovsy LLP  
1611 Telegraph Ave., Ste. 806  
Oakland, CA 94612

Julie C. Reagin, Assistant U.S. Attorney  
United States Attorney's Office  
450 Golden Gate Avenue, 9th Floor  
P.O. Box 36055  
San Francisco, CA 94102

1 Please note that the attached form answer contains a **certificate of service** which needs to be  
2 completed by the person mailing the copies of the answer to the defendant and the attorney for the  
3 United States, and which needs to be filed with the Court along with the answer.

4 **IF YOU FAIL TO ANSWER THIS WRIT OR FAIL TO WITHHOLD PROPERTY IN**  
5 **ACCORDANCE WITH THIS WRIT, THE UNITED STATES MAY PETITION THE COURT**  
6 **FOR AN ORDER REQUIRING YOU TO APPEAR BEFORE THE COURT TO ANSWER THE**  
7 **WRIT AND TO WITHHOLD PROPERTY IN ACCORDANCE WITH THE WRIT BEFORE**  
8 **THE APPEARANCE DATE. IF YOU FAIL TO APPEAR OR DO APPEAR AND FAIL TO**  
9 **SHOW GOOD CAUSE WHY YOU FAILED TO COMPLY WITH THIS WRIT, THE COURT**  
10 **WILL ENTER A JUDGMENT AGAINST YOU FOR THE VALUE OF THE DEFENDANT'S**  
11 **NONEXEMPT INTEREST IN SUCH PROPERTY (INCLUDING NONEXEMPT DISPOSABLE**  
12 **EARNINGS). THE COURT MAY ALSO AWARD A REASONABLE ATTORNEY'S FEE TO**  
13 **THE UNITED STATES AND AGAINST YOU IF THE WRIT IS NOT ANSWERED WITHIN**  
14 **THE TIME SPECIFIED HEREIN AND IF THE UNITED STATES FILES A PETITION**  
15 **REQUIRING YOU TO APPEAR.**

16 SUSAN Y. SOONG,  
17 Clerk of the Court  
18 United States District Court for the  
19 Northern District of California

20 Dated: July 7, 2020



21  Noble  
22 Deputy Clerk